



Learning Disabilities Association of America

4156 Library Road • Pittsburgh, PA 15234 • 412/341-1515 • 412/341-8077 • FAX 412/344-0224

November 1, 1990

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William K. Reilly, Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

The Learning Disabilities Association, LDA, urges you to deny the Ethyl Corporation's request for approval of the use of methylcyclopentadienyl manganese tricarbonyl (MMT) as an additive to gas until adequate testing is done to measure the health effects of chronic low-dose exposures of mercury, particularly on the fetus and young children.

LDA has long advocated for the reduction of lead, mercury and other heavy metals in the environment because they are known causes of learning disabilities. The structural and pathological effects on the brain and impairments of motor and mental function of large doses of MMT on humans are well known. The devastating and irreversible effects of the heavy metals lead and mercury on the fetus and developing brain are equally well known. There is no reason to believe that the heavy metal manganese would not have similar effects on the developing brain.

In view of our experiences with lead and mercury, the minor pollution reducing benefits of MMT should not outweigh the long-term, and potentially irreversible health risks of using MMT.

Sincerely,

LaNelle Gallagher,
President, LDA

RAINBOW CONCEPTS
Arthur E Strauss, Proprietor
Cynthia V Strauss, Most Patient Gopher
187 Acton Rd, Columbus, Ohio 43214
Home Phone 614-267-4047
18 October 1990

William K Reilly
EPA Administrator
Washington, DC 20460

Dear Mr Reilly,

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline. The Ethyl Corporation's ad campaign pushing its new additive containing the heavy metal manganese demonstrates once again the cynical guinea-piggery of this, one of the oldest of the petrochemical industry's bad guys.

PLEASE, in the name of my grandchildren and their children, (if they live long enough to have them), refuse to authorize the use of Ethyl Corp's new additive and stop forthwith any use already allowed. Yes, Ethyl has platoons of lawyers and platoons more of scientists who are "paid-to-produce-negative-results scientists". We understand that the full power of the petrochemical industry will be used behind the scenes to preserve the deregulation disgraces of the Reagan era. But don't let us down. Fight this in the media and in your agency and in the courts.

Please let us know what your intentions are up front. We promise we will play our activist/concerned citizen roles to the hilt in supporting your responsible actions. Groups like the Environmental Defense Fund, which has alerted us to this danger, will be monitoring your actions, as well as the counteracting manipulations of government and media by the Ethyl Corp.

Cindy and I are now looking hard at the shifts toward accommodation with the polluters which are taking place in the larger, more heavily lobby-oriented environmental organizations. It is hard for us to imagine that the Ethyl Corp would deliberately repeat the disastrous game it played with public health. It seems much more likely that this action is a diversion to drain off environmental advocacy energy, so as to cover up some far more insidious and damaging plan for guinea-pigging the American population. That guinea-piggery is a commonplace on the American scene cannot be disputed. Please don't be a player in that game. From your position, you should be able to expose it and to speak out for the population which looks to you for the Environmental Protection your agency's title mandates, but which two successive Administrations have successfully emasculated.

Looking forward to hearing from you,

Sincerely,

Arthur E. Strauss

Arthur E Strauss



430-10 LC-132A



E. Lochner Rosso, D.C.

October 29, 1990

Mr. William K. Rielly
Environmental Protection Agency
401 M. Street S. W.
Washington, D.C. 20460

Dear Sir:

I would like to express my support for the fuel additive HiTec 3000, product of the Ethyl Corporation, which has been added to gasoline in Canada for the last 10 years with the synificant reduction in tailpipe emissions and increased fuel efficiency produced by this product. I cannot imagine why the United States has not used it sooner.

Please give this matter your consideration for the sake of our enviornmentment.

Sincerely,

E. Lochner Rosso, D.C.

ELR/rh

Warren J. Dew
20 Battlemarch Way
Woburn, MA 01801
30 October 1990

Mr. William K. Reilly
Environmental Protection Agency
Washington, DC 20460

I understand that the Ethyl Corporation is applying for EPA approval of a gasoline additive, Methycyclopentadienyl Manganese Tricarbonyl (MMT), as a replacement for tetraethyl lead as an octane enhancer. I believe that they are arguing that the potential atmospheric manganese concentrations from the use of MMT have not been shown to cause adverse health effects

Given the decades it took to establish the adverse effects of lead, I have grave reservations about the use of a new metallic compound in gasoline. This is particularly true for metals like manganese which may be toxic at high doses. It seems likely to me that the adverse health effects of low concentrations of metals are not limited to lead, and are in fact likely to be caused by manganese as well. In fact, it seems to me quite conceivable that the same chemical characteristics that enhance octane also cause adverse health effects.

In light of the potential for widespread introduction of another health hazard, I urge you to reject Ethyl's proposal to use MMT as a gasoline additive.



Warren J. Dew

Oct. 30, 1990

To: William K. Reilly
Administrator
Environmental Protection Agency
Washington, D.C. 20460

From: Samuel Adams
47 W. 14th Street, Suite 302
New York, NY 10011

Re: Ethyl Corporation's application to approve MMT as a gasoline additive

Dear Mr. Reilly;

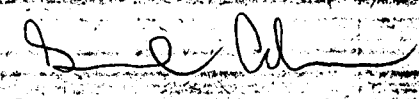
I am opposed to Ethyl Corporation's application on the grounds that the manganese in their additive is not proven to be harmless even at low levels over an extended period of time.

These quick fixes, I feel, are the wrong approach to lessening toxic metals and chemicals in the environment. Considering the damage that lead, mercury, and cadmium have wrought in the New York metro area alone, I strongly urge you to consider banning MMT as a gasoline additive. Trust me, the atmosphere is bad enough in this area as it is without throwing another wild card in the air.

A greater concentration of resources on mass transit and higher user fees on single-passenger autos in this area would be a more logical approach. It wouldn't hurt to accelerate the use of natural gas in buses, trucks and other urban vehicles either. Finally, a popular political move, at least in New York City, would be a limousine tax, since the only difference between these and regular car services is conspicuous consumption and a highly visible waste of fuel and road space.

Thank you for your attention.

Sincerely,



Samuel Adams

Nirinjan Kaur Khalsa
P.O. Box 351149
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Nirinjan Kaur Khalsa

P.7
Don Strachan
21279 Entrada
Topanga, CA 90290

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

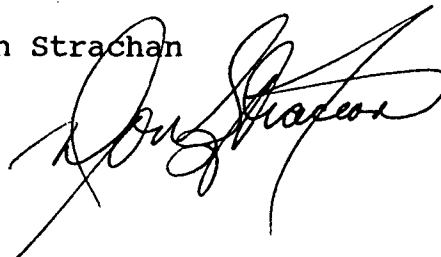
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Most sincerely,

Don Strachan

A handwritten signature in black ink, appearing to read "Don Strachan", written over the printed name.

Anne Petrocci
59 Tuxedo Avenue
Hawthorne, NJ 07506

October 30, 1990

Mr. William K. Reilly,
Administrator
United States Environmental
Defense Agency
Washington, DC 20460

Dear Administrator Reilly:

I believe that the Ethyl Corporation's "Hi-Tec 3000"
manganese-based gasoline additive will be a major detriment to
our environment and urge you to deny their application for its
use.

Please help us protect our environment and well being from
such obvious abuses.

Sincerely,


Anne Petrocci

AP/bt

Box 731

Pearl River, Ny 10265

10/29/90

Dear Mr. Reilly,

I do not support the use of Hi-Tec 3000.

Please do not approve it.

Thank you.

Yours truly,

Brenda Melton

Office of Human Resources

TO: ALL MANAGEMENT & PROFESSIONAL EMPLOYEES

FROM: Peter Bittle
Director for Administrative Services

H.R. BULLETIN NO: 90-09

SUBJECT:

REGULATIONS ON LIMITATIONS ON THE
RECEIPT OF HONORARIA & REIMBURSEMENT
FOR TRAVEL EXPENSES

DATE: 7/17/90

The State Ethics Commission has adopted final regulations covering the limitations on the receipt of honoraria and reimbursement for travel expenses. The regulations set forth conditions under which State employees may accept an honorarium and under which reimbursement for travel expenses related to the employee's official duties may be accepted (other than reimbursement from Rockland Psychiatric Center).

Honorariums offered to State employees for services related to his/her State job may not be accepted by an employee but may instead be paid directly to the State's General Fund. Honorariums offered to State employees for services not related to his/her State job may be accepted provided certain conditions are met.

Travel expenses related to a State employee's official duties may be accepted also provided certain conditions are met.

Employees who have received, will receive, or have been offered either honoraria and/or travel expenses for activities whether related to his/her official duties or not, should obtain a copy of Ethics Advisory Notice #90-9 from the Human Resources Department to insure compliance with the regulations established by the State Ethics Commission.

Forms OMH-E-1 "Request for Approval for Receipt of Honorarium" and OMH-E-2 "Request for Prior Approval for Reimbursement for Travel Expenses from Outside Organizations/Individuals" are to be used for the purpose of requesting appropriate approvals and are also available in the Human Resources Department.



312 Griffin Avenue
Williamsburg, VA 23185
October 30, 1990

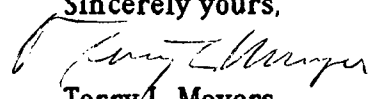
Mr. William K. Reilly
EPA Administrator
Washington, D.C. 20460

Dear Mr. Reilly:

I understand that the Ethyl Corporation is applying for permission to use MMT as an additive for gasoline. Everything I have seen suggests the MMT is extremely dangerous to life. I trust that you and your department will protect the American people and turn down Ethyl's application.

Thank you for your attention.

Sincerely yours,


Terry L. Meyers

8 32113

4 Admiral Drive, #323
Emeryville, CA 94608
October 30, 1990

William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Reilly,

I am writting to you because of my concern about the Ethyl Corporation's quest for approval of it's HiTec 3000. I am concerned about the potential hazardous effects of putting another toxic heavy metal into our environment through use of this gasoline additive.

In the interests of the health of our nation and the protection of our environment I urge you to decline approval of this polutant.

Thank you.

Sincerely,

Elaine Drukman
Elaine Drukman

Ann C. Bertino
116 Michigan Ave, NE
Apt I 21
Washington, DC 20017

October 31, 1990

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Reilly:

This letter is to request that you deny approval of The Ethyl Corporation's "HiTEC 3000", manganese-based gasoline additive. While The Ethyl Corporation claims that this additive is safe to the environment and toxic to humans only at high doses, the long-term effects of manganese on humans are as yet unknown. In high doses, manganese causes irreversible brain damage and Parkinson's-like symptoms.

It is likely that substantial amounts of manganese are likely to be released if HiTEC 3000 is approved. The minor pollution-cutting benefit is outweighed by the major health risks presented.

Please deny approval for HiTEC 3000 in the interest of the health of all Americans, especially our children.
Sincerely,
Ann C. Bertino

Rita Dantas Scott
779 Fourth Avenue
S Francisco, CA 94118

October 27, 1990

William K. Reilly
Administrator
Environmental Protection Agency
401 m street, SW
Washington, DC
20460

Dear Administrator Reilly,

The approval of the application for the
addition of "Hi Tec 3000" will mean a
poisoned environment in the future.
Please listen to the plea of a concerned citizen
and deny Ethyl Co. Application.

Truly yours,

Rita D Scott

October 26, 1990

Dear Mr. Reilly,

I am writing to let you know that I as an American citizen feel that the EPA should not approve HiTec 3000 for the Ethyl Corporation. Because we have no idea what the long term effects would be, I see no reason to add another possible pollutant into our environment. When do we begin to make a stand for quality of life rather than big business. We have the ability to create safe technology that does not impact our planet. Please send a clear message to Ethyl Corporation by denying them the right to sell HiTec 3000.

Thank you,

Debra Cristofin

James F. Tarzia
4434 Los Feliz Blvd. #211
Los Angeles, CA 90027

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,


James F. Tarzia

Founded in 1889

אגוד הרבנים המתקדמים CENTRAL CONFERENCE OF AMERICAN RABBIS

192 LEXINGTON AVENUE

NEW YORK, NEW YORK 10016-6801

FAX (212) 689-1649 (212) 684-4990

Office of the Executive Vice President

October 30, 1990

The Honorable William K. Reilly
 Administrator, Environmental Protection Agency
 Washington, DC 20460

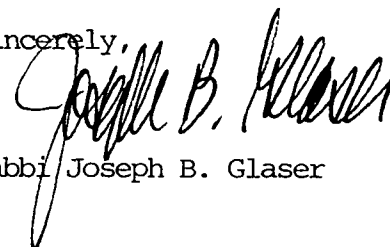
Dear Mr. Reilly:

I write to ask that EPA reject the proposal of the Ethyl Corporation to utilize manganese (MMT) as an octane-enhancing gasoline additive.

They have done enough damage to the environment and to the health of children with lead, and serious studies have indicated that there can be equal if not greater devastation incurred by this new proposal. Please reject it.

All good wishes.

Sincerely,



Rabbi Joseph B. Glaser

JBG:sk

OFFICERS:

Rabbi Samuel E. Karff, President
 Houston, TX

Rabbi Walter Jacob, Vice President
 Pittsburgh, PA

Rabbi Joseph B. Glaser, Executive Vice President
 New York, NY

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Rabbi Sidney L. Regner, Executive Vice President Emeritus
 New York, NY

Rabbi Jacob R. Marcus, Honorary President
 Cincinnati, OH

Beth Watschke
11827 Ferris Rd. A
El Monte, CA 91732

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script that reads "Beth Watschke". The signature is written in dark ink and is positioned above the printed name.

Beth Watschke

Irene Morrill
1292 Shelley Ave.
Upland, CA 91786

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

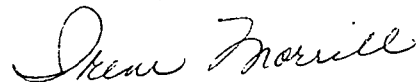
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Most sincerely,

A handwritten signature in cursive script, appearing to read "Irene Morrill".

Irene Morrill

Cynthia Whitcomb
2580 Roscomare Rd
Los Angeles, CA 90077

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

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Most sincerely,

Cynthia Whitcomb
Cynthia Whitcomb

10/29/90

Sarab Jeet Singh Khalsa
1625 Livonia Ave.
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

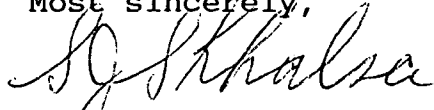
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Most sincerely,



Sarab Jeet Singh Khalsa

Susanne Whitcomb
6320 Jerseydale Rd.
Mariposa, CA 95338

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Susanne Whitcomb

10/27/90

Dear Mr. Reilly:

I am very concerned about the possibility of the EPA approving "HiTec 3000" a toxic manganese-based gasoline additive. Manganese is a toxic heavy metal whose effects on human health are unknown.

We already made the same mistake with leaded gasoline, with the result that we have an epidemic of lead-poisoning in our children.

Please don't allow Ethyl Corporation to use the American public as guinea pigs with this new gasoline additive.

~~There~~ I urge you to deny their application for approval of "HiTec 3000."

Sincerely,

Kate McKean
6535 Tremont St
Oakland CA 94609

10/27/90

Brian Pelletier
13670 Valley View Road, #120
Eden Prairie, MN 55344
October 31, 1990

William K. Reilly
EPA Administrator
Washington, DC 20460

Mr. Reilly,

I'm writing this letter to urge you to reject the application of the Ethyl Corporation to use methycyclopentadienyl manganese tricarbonyl or MMT. Very little is known about the health risks of manganese, which is a similar situation to 1925 when the Ethyl Corporation introduced tetraethyl lead as a "gift of God." We now know how harmful lead is, and how much damage we've already done to our environment and our health. Let's not make the same mistake with manganese.

Instead, we could all benefit from a greater availability of an ethanol-gasoline mixture. Not only does this mixture increase octane and MPG, but it improves engine performance and creates much less pollution than straight gasoline. Using ethanol made from corn and other grains can also help America's farmers.

Again, please reject Ethyl's application of manganese gasoline additives.

Sincerely,



Brian Pelletier

RUTH ADAMS, M.D.

Ruth Adams, M.D.
4551 Tompkins Ave.
Oakland, CA 94619

17101 007-0021

29 Oct. 1990

William K. Reilly, Administrator
Environ. Protection Agency
401 M. Street, S.W.
Washington, D.C. 20460

Dear Mr. Reilly:

This is to urge you to disapprove the request of Ethyl Corp. of America to produce large quantities of the gasoline additive "Hi Tec 300".

This, added to gasoline, would result in pollution of the air and chronic exposure of citizens to the toxic heavy metal, manganese.

Need I remind you that the Ethyl Corp. was responsible, as chief supplier of lead gasoline, for chronic lead poisoning of hundreds of thousands of children in the western hemisphere. As you probably know, lead poisoning produces varying degrees of mental deficiency.

The effects of chronic exposure to inhalation of the toxic heavy metal, ^{manganese}, should be understood before you approve Ethyl Corp's request regarding this gasoline additive --

Respectfully yours,

Ruth Adams

RUTH ADAMS

Sita Kaur Khalsa
1636 1/2 Preuss Rd.
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

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Most sincerely,



Sita Kaur Khalsa

Gurujodha Singh Khalsa
Siri Ved Kaur Khalsa
1605 1/2 Wooster
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

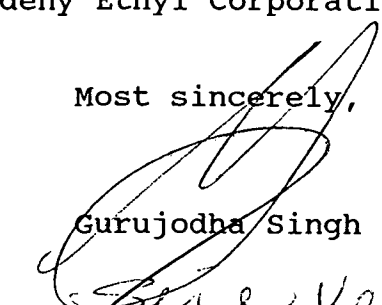
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Most sincerely,



Gurujodha Singh Khalsa



Siri Ved Kaur Khalsa

4 Scott Lane
Larkspur, CA 94939
October 29, 1990

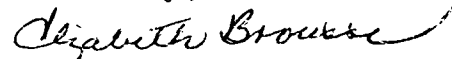
William K. Reilly
EPA Administrator
Washington, DC 20460

Dear Mr. Reilly:

Among the many environmental groups I belong is
the Environmental Defense Fund.

I just received a notice that Ethyl Corporation
is asking your agency for approval of HiTec 3000, a
toxic manganese-based gasoline additive. I strongly
urge you and your colleagues to deny this request.

Sincerely,

A handwritten signature in cursive script, reading "Elizabeth Brousse".

Elizabeth Brousse

Siri Dharma Kaur Khalsa
Gurumantra Singh Khalsa
4108 Watkins Dr.
Riverside, CA 92507

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

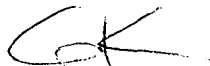
Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Siri Dharma Kaur Khalsa



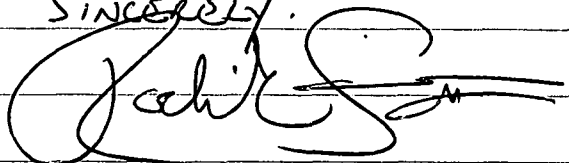
Gurumantra Singh Khalsa

10/26

DEAR MR. REILLY,

I'm WRITING TO URGE YOU TO DENY
ETHYL CORPORATION'S APPLICATION FOR "HiTEC 3000",
A TOXIC MANGANESE-BASED GASOLINE ADDITIVE.

Sincerely,

A handwritten signature in dark ink, appearing to read "Roderick Spencer". The signature is fluid and cursive, with a large initial "R" and a long horizontal stroke at the end.

RODERICK SPENCER
602 BAY ST.
SANTA MONICA, CA.
90405

108-11142

Shay Chan
838 S. Stanley Ave.
Los Angeles, CA 90036

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Shay Chan

Matthew Judge
6021 Hillside Ave West
Indianapolis, IN 46220

October 29, 1990

Mr. William K. Reilly
EPA Administrator
Washington, D.C. 20460

Dear Mr. Reilly:

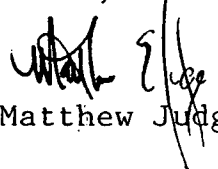
It has been said that "history doesn't repeat itself, but it sometimes rhymes."

I urge you to reject the destructive error of history that is attempting to manifest itself again. We have paid dearly for our blind willingness to add tetraethyl lead to our gasoline and must contend with the consequences of that decision for years to come. Now the Ethyl Corporation would again saturate our air and lives with a danger of unknown proportions.

Please protect my children from this company. Don't allow MMT to become the environmental and health disaster of the next generation. We simply don't know enough about the effects of manganese to begin bathing in it.

Thank you.

Yours,


Matthew Judge

Patricia Brumm
123 Natoma Ave. Apt. G
Santa Barbara, CA 93101

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

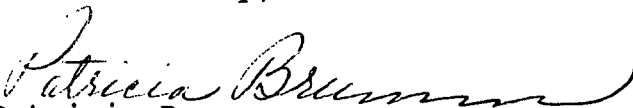
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,


Patricia Brumm

Krishan Kaur Khalsa
8823 Horner St.
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

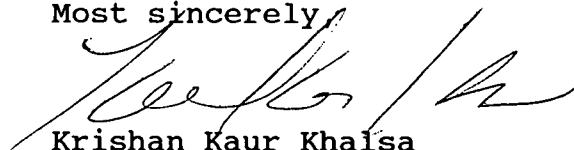
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Krishan Kaur Khalsa

Margaret Moore
3144 Maurepas Street
New Orleans, LA 70119
(504) 948-4452

October 29, 1990

Mr. William K. Reilly
Administrator, U.S. E.P.A.
Washington, DC 20460

Dear Mr. Reilly:

I'm writing to urge you to deny Ethyl Corporation's application to use the substance "HiTec 3000" as a gasoline additive. In light of the fact that the additive has been shown to be toxic, and that its use would serve no one but Ethyl, I think it is your duty to make sure it is not allowed into gasoline. Please remember that the E.P.A. is supposed to protect the environment, not industry.

Sincerely,



Margaret Moore

October 24, 1990
78 Ridge Ave.
Newton, MA 02159

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Administrator Reilly:

In the interests of public health and environmental protection, I request that the Environmental Protection Agency deny permission for the Ethyl Corporation of America to produce a gasoline additive it calls "Hi Tec 3000." We are having to deal with lead contamination in the environment already and cannot allow the release of manganese into the environment that this substance would cause.

Sincerely,
Carmilla G. Spence

0000130 #10:45

Box 674
Dubois Wy. 82513
Nov. 6, 1990

EPA Administrator
William K. Reilly
Washington, D.C. 20460

Dear Mr. Reilly:

I write to urge most strongly that Ethyl Corporation's application to use MMT as a gasoline additive be rejected.

We are still paying the price to the public health caused by Ethyl's gasoline additive, tetraethyl lead despite the considerable reduction imposed by the use of unleaded gasoline..

Now Ethyl comes forward to request this new additive, MMT, using virtually the same arguments they used for lead in 1925: that the manganese released into the environment will be negligible and that it is only toxic at high doses in industrial settings.

While we do not know what the chronic low dose effects of human exposure to manganese are, our tragic experience with lead makes it imperative that we not repeat the

mistakes made with tetraethyl lead as a gasoline additive.

Please reject their application and suspend all currently permitted use of manganese as a gasoline additive in the U.S.

Sincerely,

Gladys Hawley

NOV 13 11:55

Nov 7, 1990

Dear Mr. Reilly:

I'm writing to urge you to
reject Ethyl's application to use
a manganese additive to gasoline.

After seeing all the damage done
to children from lead poisoning,
I'm surprised at the audacity
of Ethyl.

Please reject this proposal.

Sincerely,

NOV 13 1990

Karen A. Garrett

James W. Tummins

599 Wright Street 102, Lakewood, Colorado 80228

Telephone: (303) 988-4221

Recycled Paper

November 9, 1990

William K. Reilly
E.P.A. Administrator
Washington, D. C. 20460

Dear Mr. Reilly,

In recent weeks, the Ethyl Corporation has applied to use mehtycyclopentadienyl manganese tricarbonyl (MMT) as an octane-enhancing gasoline additive. The Ethyl Corporation contends that the manganese that will be put into the air is negligible and not hazardous. They made the same claim about lead in 1925.

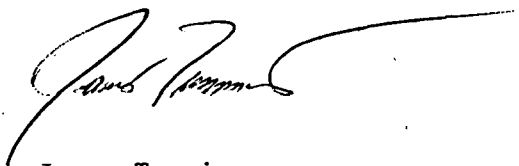
Current research has indicated that manganese in high concentrations is a human neurotoxin. The effects of manganese are persistent and irreversible, resulting in severe impairments in movement and mental state.

There is also the issue of what we do not know. We do not know what the chronic, long-term low dose effects of human exposure to manganese. We do not know what the "safe" level of manganese exposure is, especially for the young, and old, who are usually more sensitive to environmental contamination. We do not know if manganese is carcinogenic. There is evidence that it can break DNA, suggesting that it is carcinogenic.

We do know, from our experience with leaded additives, that the long term effects of contamination and pollution cannot be easily or quickly reversed. We have the opportunity to apply the knowledge that we have gained over the last 50 years from our experience with lead to a new and similar experience. To disregard that experience is to invite a repetition of the catastrophe that we now face with lead pollution. As a society we cannot afford a repetition of that experience.

Please reject Ethyl Corporation's application to use MMT as a gasoline additive in the United States.

Sincerely,



James Tummins

Ronni Rubin
P.O. Box 9245
Brea, CA 92622-9245

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

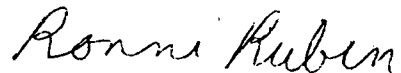
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Ronni Rubin

P.41
Janice Tuzzolino
6765 Whitman dr.
Buena Park, Ca. 90620

11-8-90

Dear Sir,

I work in a public school. We are and will be seeing many more children who have social and academic problems.

All these children can't be "drug babies". Perhaps some of the problems are caused by the toxins in our environment. - We can't afford more health problems!

I urge you to please reject the new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

Thank you,

Janice Tuzzolino

November 6, 1990

Mr. William K. Reilly, Director
Environmental Protection Agency
Washington D.C. 20460

Dear Mr. Reilly:

I've been informed that your agency is considering an application from the Ethyl Corporation for a new gasoline additive, MMT, which contains the element manganese. I also understand that there are no scientific studies on the long-term, low-dose health effects of manganese on human beings, or the effect of this substance on the environment as it gradually accumulates.

If this information is correct, it would be hard to imagine that your agency would seriously consider approving such an application without the most complete and rigorous kind of scientific justification. However, as I am a newcomer to the world of regulatory agency politics, I would like to know the current status of this application, your thinking on the merit of it, and what kind of experimental studies you would find necessary to justify approval of this additive.

Yours sincerely,



Meyer Scharlack
3330 Bona Street
Oakland, CA 94601

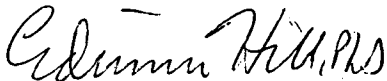
Edwin L. Hill, Ph.D.
2121 South 19th Street
Tacoma, Washington 98405

William K. Reilly
EPA Administrator
Environment Protection Agency
United States Government
Washington, DC 20460

Dear Mr. Reilly,

It is my understanding that the Ethyl Corporation has recently introduced a manganese based gasoline additive, Methycyclopentadienyl Manganese Tricarbonyl (MMT), for consideration by your agency to be approved for inclusion in gasoline as an octane enhancer. I have grave doubts that this additive would have any worthwhile benefits to offer the United States population given the lack of any independent objective evidence demonstrating Ethyl Corporation's claims about its value. More importantly, however, I am concerned about the potential damaging effects that could be experienced by the public from the neurotoxic effects of wide spread distribution of such a toxic metal as Manganese into the environment through automobile and truck exhaust fumes. Indeed, given the past performance of the Ethyl Corporation in terms of product development, there is every reason to expect that their new MMT gasoline additive will be every bit as much the "gift of God" that Tetraethyl Lead was when they introduced it in 1925. I strongly urge you to lead your agency in adopting a strict and conservative scientific evaluation of the costs and benefits of MMT from both the short term and long term perspectives. Let's not forget the length of time it took to realize the damaging effects of excessive exposure to lead in the environment and the difficulties encountered in removing it from wide spread public usage. Thank you for your attention and consideration of this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Edwin L. Hill". The signature is fluid and cursive, with the first name "Edwin" being more prominent and the last name "Hill" following in a similar style.

Edwin L. Hill, Ph.D.

November 4, 1990

Mr. William K. Reilly
Administrator
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Dear Mr. Reilly:

We are writing to communicate our deep concern over the fact that Ethyl Corporation is attempting to win approval to market "HiTec 3000." The manganese contained in this additive is a heavy metal with the very real potential to cause major public health problems - just like the leaded gasolines this same company foisted on us in the 1920s.

We strongly request that the EPA refuse to allow Ethyl Corporation to market this dangerous new additive.

Sincerely,



Michelle van Schouwen



Stephen van Schouwen

Dr. Hari Bhajan Singh Khalsa
Hari Bhajan Kaur Khalsa
1573 Cardiff Ave.
Los Angeles, CA 90035

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

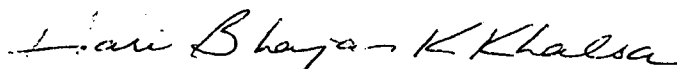
Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! We strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Dr. Hari Bhajan Singh Khalsa



Hari Bhajan Kaur Khalsa

November 5, 1990

Richard K. Barbieri
4831 S. Dunkirk Way
Aurora, CO 80015

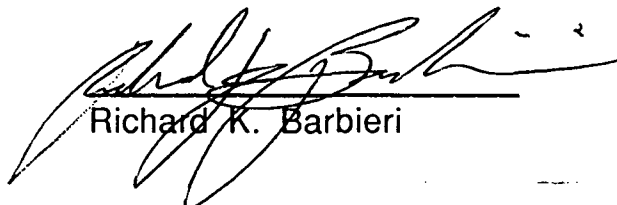
William K. Reilly
Environmental Protection Agency
401 M Street Southwest
Washington, D.C. 20460

Dear Mr. Reilly,

I am writing to express my concern with the possible registration of the Ethyl Corporations product MMT for use as an additive in gasoline. The environmental effects of long term exposure to low levels of manganese are unknown. I do not think we should register a product which has unknown effects. In 1925, lead was added to gasoline even though the "experts" said it would cause no harm. This has proved to be totally erroneous with lead being one of the top toxic polluters of the country, especially of children in urban areas. I believe that we should not repeat this disaster. Please do not allow manganese as an additive to gasoline without a major long term study on the effects of low levels of manganese on the environment and humans. It is better to "err" on the side of caution than to poison a new generation.

Thank you for your time and effort on this issue.

Sincerely,



Richard K. Barbieri

6 Nov 1990

EPA Administrator William K. Reilly
Washington, DC 20460

Dear Mr. Reilly,

Please do Not allow the Ethyl Corp.
to use methycyclopentadienyl manganese
tricarbonyl (MMT) as an octane -
enhancing gasoline additive.

We must do all we can to give our
country back its clear, blue skies!

Respectfully,

Mary Nilsson

9406 - Whitney Pl. NW

Seattle, WA. 98117

12-011-54

Howard Frankl
5905 Soquel Dr. Suite 600
Soquel, CA 95073

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

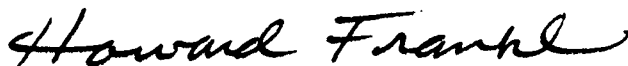
Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

A handwritten signature in cursive script that reads "Howard Frankl".

Howard Frankl

Tim Kiley
1122 6th St. #306
Santa Monica, CA 90403

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,



Tim Kiley

MR. WILLIAM K. REILLY
ADMINISTRATOR
ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

NOVEMBER 6, 1990

DEAR MR. REILLY:

I READ WHERE THE ETHYL CORPORATION HAS PRODUCED ANOTHER ADDITIVE FOR OUR GAS TANKS. THE FIRST ONE WAS AN ENVIRONMENTAL DISASTER (LEAD) AND IT IS SUGGESTED THEIR SECOND ATTEMPT USING MANGANESE WOULD ALSO POSSESS THE POTENTIAL OF AFFECTING LIFE ON PLANET EARTH. HOPEFULLY, OUR EXPERIENCE WITH LEAD HAS TAUGHT US A LESSON. WE DO NOT NEED ANOTHER FIFTY YEARS OF HEALTH THREATS. LET'S SEND THE ETHYL CORPORATION BACK TO THE DRAWING BOARDS AND REJECT THEIR MIRACLE ADDITIVE AS THE DEVIL IN DISGUISE.

I LOOK FORWARD TO MEETING YOU AT THE HUGH MURPHYS IN CONWAY, ARKANSAS ONE OF THESE DAYS. BEST OF LUCK AND GOOD FORTUNE.



CHARLES R. TILLEY

3226 BENDA STREET, LOS ANGELES, CALIFORNIA 90068

BRIAN LIPCHIK PHOTOGRAPHY

Dear Mr. Reilly,

As a proud American, a concerned environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny the Ethyl Corporation's application for their product "Hitec 3000." This is a manganese based gasoline additive which has been proven to be exceedingly toxic.

Thank you for your attention and your concern.

Sincerely,



Brian Lipchik

P.O. Box 578626
Chicago, IL 60657
312 • 335 • 0238

Dr. & Mrs. Arthur Rubin
P.O. Box 9245
Brea, CA 92622-9245

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Art L. Rubin

Judy Code

852 North Occidental Blvd., Los Angeles, CA 90026 (213) 484-9323 Fax: 484-9184

22 October 1990

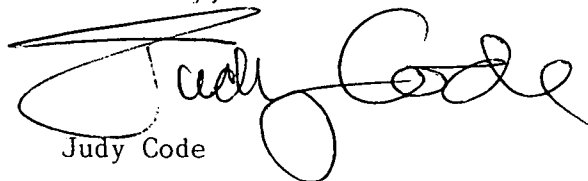
William K Reilly
Administrator
United States Environmental Protection Agency
Washington D.C.

Dear Administrator Reilly,

I have recently been informed by the Environmental Defense Fund (an organization of which I am a member) that the Ethyl Corporation has an application for a manganese based gasoline additive called "HiTec 3000". Manganese released into the environment as an attempt to handle emissions' negative impact is so short sighted as to be laughable. The long term effects of manganese released under these conditions has not been determined by thorough study. Being aware of it's toxic nature, however, leads one to the very likely suspicion that Ethyl Corporation is in danger of repeating it's 'leaded-gas' fiasco that has resulted in the chronic lead poisoning of millions of children on an epidemic scale.

I urge you to deny Ethyl Corporation's application for 'HiTec 3000'.

Sincerely,


Judy Code

William K. Reilly
EPA Administrator
Washington D.C. 20460

November 7, 1990

I am extremely concerned over the possible use of methycyclopentadienyl manganese tricarbonyl (MMT) as a gasoline additive without significantly more research.

I am worried that the problems we discovered with leaded gas will be repeated with manganese.

As a nurse and Certified nurse-midwife, I wonder about the effects on pregnant women and their fetuses and children.

I urge you to reject entirely Ethyl Corporation's application to use MMT.

Thank you for your concern,


Fran Kinkead C.N.M.

REBECCA L. JOHNSON, Ph.D.

319 TAPLOW ROAD
BALTIMORE, MARYLAND 21212

Psychologist
License # 1993

12 Novewmber 1990

William K. Reilly
EPA Administrator
Washington, D.C. 20460

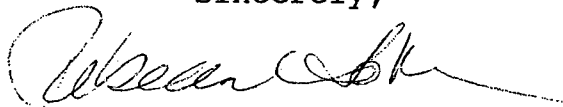
Dear Mr. Reilly:

As a psychologist who has worked with many children damaged by exposure to lead, I am deeply concerned about the Ethyl Corporation's recent request for approval to use methycyclopentadienyl manganese tricarbonyl (MMT) as an octane-enhancing gasoline additive. It is my understanding that any reduction in tailpipe emissions caused by the addition of MMT would be very small and would pale in significance next to the dangers of using such an additive. Manganese at high dosages is a neurotoxin causing irreversible damage; there is evidence that fetuses, young children, and the elderly may be expecially vulnerable to its effects. There has been no investigation of the safety of chronic, low-dose human exposure. Applying what we have learned from our sad experiences with lead, we know that contamination of the urban environment (dust, soil, and air) by manganese, should it prove to be hazardous to heatlh, will be extremely difficult and costly to remedy.

Please reject Ethyl's request to use MMT.

Thank you for your attention.

Sincerely,



Rebecca L. Johnson, Ph.D.



GREGORY OPTICS

Consulting Engineer-Design-Fabrication

Oct 30 90

Wm. K. Reilly, EPA Administrator
Washington DC

Dear Mr Reilly

Mn gasoline additive

I suppose you've read the enclosed review of the manganese additive situation.

Considering the huge problem we got into with the lead additive, I consider it unthinkable that we risk the same catastrophe again with an unknown new routine.

To expose ourselves and our progeny to such a risk is very high stakes gambling by the Ethyl Corp. stockholders, and should be considered unthinkable by those responsible for our future health.

Please: your action is vital.

Sincerely
John Gregory

90NOV 2 P 1:45

RECEIVED
EPA
CORR. CONTROL

A New Idea from the Folks Who Gave Us Leaded Gas

By EDF toxicologist Dr. Ellen K. Silbergeld, who was the only environmentalist to appear before the Environmental Protection Agency (EPA) to urge rejection of an application to use a manganese-based compound as a gasoline additive.

In 1925, the Ethyl Corporation introduced its new gasoline additive, tetraethyl lead, as "a gift of God." It took us over 50 years to realize how diabolical this "gift" proved to be. The hard-won removal of most lead from gasoline represents one of EPA's most significant public health achievements. I am proud to have participated with EDF in that victory.



ELLEN K. SILBERGELD

Now, in 1990, Ethyl comes bearing yet another gift, methycyclopentadienyl manganese tricarbonyl (MMT), and asks EPA to approve it as an octane-enhancing gasoline additive. To this offering, EPA must just say "No."

Lead poisoning is an epidemic in the U.S. Even after considerable reductions

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925.

have been imposed on the use of lead in gasoline—only after prolonged debate and litigation, it should be noted—we are just now confronting the extraordinarily difficult challenge of cleaning up the residues of lead fallout from playgrounds, roadsides, and backyards in America.

The parallels between Ethyl's 1990 proposal to use manganese and its 1925 lead proposal are chilling. The exclusive justification for each additive is its purported effect on emissions of hydrocarbons and nitrous oxides from cars. No data were or are given on the potential cumulative health effects of massive inputs of a toxic metal into the environment, its deposition on surface dusts and soils, or its long-term fate and pathways of exposure to humans.

In 1925, Ethyl argued that the amounts of lead to be added to gasoline were negligible and that lead was only toxic at the high doses encountered in certain industrial settings. In 1990, it argues that



Kirk Cordley/Impact Visuals

With ever-increasing numbers of cars on the road, manganese added to gasoline would—like lead—accumulate in the environment with potentially tragic results, particularly in urban areas.

the manganese releases to the environment will be insignificant and that manganese is only toxic at high doses in industrial settings.

In both cases, the critical national importance of accepting Ethyl's additive is argued. In a well-funded ad campaign claiming that MMT can reduce tailpipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of exposure to manganese.

Amazingly, in light of the history of leaded gasoline, Ethyl finds it unnecessary to do anything more in 1990 than it did in 1925. Ignoring contrary evidence, it selectively cites bits of data to support its contention that the use of MMT will not increase airborne manganese concentrations over cities, and provides no data on the impacts of manganese additives on manganese levels in other parts of the environment. It presents no in-depth review of the health effects of manganese, nor—more important—any discussion of critical gaps in the data about manganese toxicity that must be filled before a decision that could release many thousands of tons of manganese to the environment can be approved.

The data on manganese are relatively sparse compared to lead—we have not yet conducted a massive human experi-

ment with manganese. But *both what we know and what we do not know* about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application.

We know that manganese at high dose is a demonstrated human neurotoxin, with persistent and irreversible pathological effects on brain structure and resulting severe impairments in movement and mental state. We have indications that manganese may also selectively affect the fetus, the young, and the aged.

We do *not* know what the long-term chronic, low-dose effects of human exposure to manganese are. We do *not* know what a "safe" level of manganese exposure is, particularly for the young or the aged who may be at increased risk. We do *not* know if manganese is carcinogenic, although there is evidence that it can break DNA, which may indicate cancer-causing potential.

But from our tragic experience with lead, we know a great deal about the likely cumulative effects of such a use upon human exposure. We know that the gradual contamination of the environment by manganese will not be readily reversed. We know that manganese will

Society cannot afford to repeat the public health catastrophe associated with the use of lead in gasoline.

accumulate in many places—particularly in urban dusts and soils—that are subject to intensive human interaction and that will be sources of direct human exposure to manganese.

We rarely have an opportunity to apply the clear lessons of 50 years of very similar experience. To disregard these lessons by approving the widespread and inevitably dispersive use of manganese would be to invite repetition of the public health catastrophe associated with the use of lead as a gasoline additive since 1925. Society cannot afford such a repetition. EDF is urging EPA to reject this new application and immediately suspend all currently permitted use of manganese as a gasoline additive in the United States.

EDF MEMBER ACTION ALERT

Concerned members can help by writing to EPA Administrator William K. Reilly (Washington, DC 20460) urging him to reject Ethyl's application to use MMT.

EDF and Cancer Researchers Join to Save the Pacific Yew

Prominent cancer researchers and ten environmental groups joined EDF in petitioning Interior Secretary Manuel Lujan to list the Pacific yew (*Taxus brevifolia*) as a threatened species under the Endangered Species Act. Simultaneously, the American Cancer Society urged Lujan to "take any and all actions to protect the Pacific yew as a 'threatened species.'"

The bark of the tree, a slow-growing species found mainly in the ancient forests of the Pacific Northwest, is the only known source of taxol, one of the most promising new drugs for treating various cancers, including advanced ovarian cancer. A shortage of natural taxol is constraining medical research, and all attempts to synthesize the drug have failed.

"It is incredible that the Pacific yew receives virtually no protection on either private or public lands, in view of its rarity and importance to cancer research and treatment," said EDF attorney-scientist Bruce S. Manheim, who drafted the petition to Lujan.

The Pacific yew was once found widely in forests from Alaska to central California, but it has been seriously depleted by heavy logging. According to one estimate, only 5% of original Pacific yew habitat in ancient forests remains.

The thin bark of the yew makes it particularly vulnerable to clearcut logging and burning. Moreover, the yew does not grow fast enough to reestablish itself in tree plantations during the typical 50-to-80 year rotation.

Taxol's extraordinary effectiveness as an anti-cancer compound was shown in a recent trial in which it produced a positive response in 30% of ovarian cancer patients who had not responded to previous treatment. Preliminary results from other



Attorney-scientist Bruce S. Manheim has worked with 30 states to develop programs to protect endangered wild plant species.

studies suggest that taxol may also help in treating breast cancer, non-small cell lung cancer, head, neck, and stomach cancers, and malignant melanoma.

Listing the Pacific yew as a threatened species would authorize the Federal Government to protect the species from habitat destruction and commercial exploitation. It would permit a controlled sustainable harvest for medical research while prohibiting unauthorized collection of the tree for other purposes.

"The yew is a tangible example of the need to protect forests and the myriad living resources within them," said Manheim. "If we do not, we will have squandered a rich storehouse of natural products that, like taxol, may have enormous medical value."

Task Force to Study Fast-Food Trash

Continued from page 1.

it has the clout and the ability to make this an important study by transforming the recommendations into an impressive set of actions. The joint study could have broad implications for all producers and users of plastic and paper packaging, in both food and non-food industries," Denison said.

Krupp emphasized the unique nature of the task force. "We hope this process will demonstrate how business and environmental groups with very different perspectives can nevertheless work together to improve the environment," he said. "At the same time, our agreement provides for each organization to preserve its independence and integrity." He emphasized that EDF will continue to pursue strong legislation and litigation on solid waste issues.

Press Reaction to Joint Announcement

"Big Mac Joins With Big Critic To Cut Trash"

—The Wall Street Journal

"...may break ground in the fight to protect the environment."

—The Boston Globe

"The concept of peaceful negotiation of differences may not find many takers in the Middle East. But it's gained new life here at home between a major environmental group that usually sues waste-producers and one of its most likely targets, the giant McDonald's fast-food chain."

The Tribune, Oakland, California

"One welcome side effect of the plan is McDonald's decision not to build incinerators at its restaurants to burn wastes."

—Star Tribune, Minneapolis-St. Paul

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EDF Letter

6 Buffalo St.
Nunda, NY 14517
Nov. 9, 1990

William K. Reilly, Administrator
Environmental Protection Agency
Washington, D. C. 20460

Dear Administrator Reilly:

As a parent concerned about the health of the nation's children and as responsible occupant of my environment, I am writing to express my deep concern regarding Ethyl Corporation's intention to market "HiTec 3000", a toxic manganese-based gasoline additive.

I urge you to deny their petition for EPA approval. The best way to prevent degradation of the environment is not to introduce contaminants in the first place. Thank you for your concern.

Sincerely,

Maryann Roby
Maryann Roby

11/5/90

Dear Mr. Reilly,

Please do not repeat the same disaster of 1925. Please do not support Ethyl Corporation's application to use MMT as a gasoline additive. It is incomprehensible to me how we can't learn from a past mistake of adding lead to gasoline. Lead poisoning has caused serious and continuing health problems in the United States. The data on manganese are relatively sparse compared to lead - we have not ~~yet~~ yet conducted a massive human experiment with manganese. But both what we know and what we do not know about the likely toxic effects of adding large amounts of manganese to the environment must persuade EPA to reject this application. We can't afford to repeat the public health catastrophe associated with the use of lead gasoline. Thank you in advance for your consideration.

Have a happy & healthy holiday season

Sincerely,

Stella Golden
1052 Colony Dr.
Crystal Lake, IL

60014

To:

EPA Administrator William K. Reilly
Washington, DC 20460

Dear Mr. Reilly:

I urge you to reject the Ethyl Corporation's application to use a manganese-containing gasoline additive, MMT.

The Ethyl Corporation has done no more to study the long-term effects of MMT than it did with tetraethyl lead additive in 1925, and it offers the same justification for using it that it did for lead: that it supposedly may reduce hydrocarbon and nitrous oxides from car emissions. What is known about manganese is that in higher, short-term doses it causes irreversible, serious damage to the human brain.

The experiment with lead additive proved to be a terrible mistake that we are still paying for. In another fifty years -- or maybe far less -- we could face the same problems with manganese that we are with lead, or even worse ones. Please don't make the same mistake that was made in 1925. Refuse the Ethyl Corporation's application for approval for MMT.

Robin Weare
5654 Sidney Ave.
Long Beach, CA 90805

28 65

374 N. 1500 W
Cedar City, UT 84720
Nov. 10, 1990

Mr. Wm. K. Reilly
EPA Administration
Washington, DC 20460

Dear Mr. Reilly,

re: Reject MMT

More cars on the road.

More gasoline being burned.

Manganese--like lead--will accumulate in the environment with potentially hazardous result, especially in the cities where most children live and play.

We don't need MMT until its effects have been tested for the long term and proven safe.

Let's not have another tragic experience like leaded gas!

We urge immediate suspension of all current use of manganese additives in gasoline.

For safer air,

Howard I. Jump

Audrey G. Jump

Howard I. Jump
Audrey G. Jump

11-10-90

The Permanente Medical Group, Inc.

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Physician-in-Chief Assistant Physician-in-Chief Assistant Physician-in-Chief Assistant Physician-in-Chief

JERRY NEWMAN
Administrator

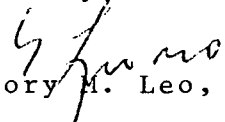
November 1, 1990

EPA Administrator
William K. Reilly
Washington D.C. 20460

Dear Mr. Reilly:

I strongly urge you to reject Ethyl's application to use MMT. Until we can prove that MMT, in particularly manganese is harmless, I don't think we should take a chance of contaminating the environment with it. There are many high octane gasolines without lead that have not had to use manganese as an additive. Let us not repeat our errors with lead with this other substance of which we are not sure.

Sincerely,


Gregory M. Leo, M.D.

Waltressa Molsberry
2956 Otterson Ct.
Palo Alto, CA 94303

William Reilly, Administrator
Environmental Protection Agency
401 M Street SW
Washington, D.C. 20460

Dear Mr. Reilly,

Ethyl Corporation's application to the EPA for approval of "HiTec 3000" should be denied. This new gasoline additive, touted by Ethyl as "environmentally safe," contains manganese, a toxic heavy metal known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

Ethyl Corporation's last experimental exposure of the entire population of our nation to a toxic heavy metal began in 1925, when they were the first to champion the use of lead additives in gasoline. Leaded gas has, in the last 65 years, been a major contributing cause of chronic lead poisoning in millions of children around the world.

Ethyl must not be allowed to conduct another such experiment as they reap great profits in the name of helping the environment! I strongly urge that you deny Ethyl Corporation's application for "HiTec 3000."

Most sincerely,

Waltressa Molsberry
Waltressa Molsberry

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

In other words, the Ethyl Corporation wants permission to use the entire U.S. population as test subjects in a very profitable experiment on chronic exposure to a toxic heavy metal. And it won't be the first time either!

Since 1925, Ethyl Corporation has championed the use of leaded gas, and has been the chief supplier of lead gasoline additives now known to have been a MAJOR CONTRIBUTING CAUSE OF CHRONIC LEAD POISONING AFFECTING MILLIONS OF CHILDREN AROUND THE WORLD.

For the sake of its own profit, Ethyl Corporation is again ready to put our environment and public health at serious risk.

We simply can't let Ethyl Corporation put another toxic heavy metal additive in gasoline! There's no reason to open our environment to a new health hazard. We can't tolerate future unknown clean-up costs when this problem is altogether PREVENTABLE TODAY. And with your help we won't have to. Think Earth First!

Sincerely a concerned voter,

Name: Dawn Gilbert

Address: 4160 N. Park Ext.
Cortland Ohio 44110

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

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Sincerely, a concerned voter,

Name: *Robert E. Bar*

Address: *168 Kenmore N.E.
WARREN, Oh. O
44483*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

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Sincerely a concerned voter,

Name:

Rebekah S. Pruttyman

Address:

*1683 Pick Leach Rd. N.
N. Bloomfield, Ohio
44450*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

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Sincerely a concerned voter,

Name: Syed Mohammed Ashraf

Address: 2460 KENILWORTH
CLEVELAND, OHIO 44106.

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name: *Melissa Braz*

Address: *2121 PEACE ST NW
WARREN, OH, 44483*

Administrator William K. Reilly
Environmental Protection Agency
401 M Street, SW
Washington DC 20460

Dear Administrator Reilly,

As an environmentalist and an active member of the Environmental Defense Fund, I strongly urge you to deny Ethyl Corporation's application for "HiTec 3000," a Toxic manganese-based gasoline additive. This toxin is known to produce symptoms of Parkinson's disease at high doses. Adding "HiTec 3000" to gasoline will release into the environment large amounts of manganese, whose long-term effects on human health are unknown.

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Sincerely a concerned voter,

Name: *Ronald D. Gilbert*

Address: DONALD D. GILBERT
4160 NORTH PARK AV EX
CORTLAND, OHIO 44410

November 8, 1990

William K. Reilly
EPA Administrator

Washington, D.C. 20460

Dear Sir:

As an active member of the Environmental Defense Fund, I must strongly urge you to reject the Ethyl Corporation's application to use MMT. In a well funded ad campaign claiming that MMT can reduce tail pipe emissions, Ethyl is seeking to exploit public concern over pollutants in global and local air. The purported reductions, if any, are very small and are overwhelmed by the health costs of the exposure to manganese.

Please refuse this application.

Sincerely,

Mark J. McMillan Jr.

Mark J. McMillan Jr.

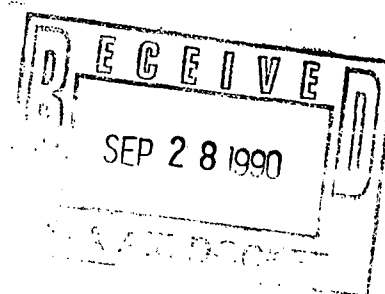
POB 5575

Norman OK 73070

A-90-16
IV-D-14416 Skymist Terrace
Olney, MD 20832

September 5, 1990

William K. Reilly, Administrator
Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460



Dear Administrator Reilly:

I write to you concerning Ethyl Corporation's request for approval to market HiTEC 3000, a performance fuel additive which has the potential to reduce harmful automobile emissions, for use within the United States. From the information Ethyl Corporation has provided, it appears the additive would be of tremendous boon to many of the Nation's most smog-plagued areas while simultaneously extending vital petroleum supplies, at a rate comparable to U.S. purchases for the Strategic Petroleum Reserve and at very reasonable cost.

No doubt some skepticism may exist with such a tremendous windfall! Seeing Ethyl's advertisement in Business Week, I was skeptical and had several questions. Of concern was how this additive would compare with our experiences with lead-based additives of decades ago and of the health effects of the many aromatic and other octane enhancing additives used today. Evidence I have received indicates this manganese-based additive should not replicate an increase in health risks as we experienced with lead-based additives of decades ago, and should help reduce the need for other pollutant contributing additives now in use. With the way many motorists feel about regular versus super unleaded gasolines and "performance," the continued over consumption of premium fuels with there attendant health and pollution problems is likely to continue. Consideration should be given to allow HiTEC 3000 be used to the fullest extent practicable to reduce the use and harmful effects of current performance additives.

Our goal should be to create more efficient utilization of our resources, which will result in fewer harmful pollutants entering our environment. HiTEC 3000 appears to be a rational, cost effective, and environmentally beneficial means for achieving this goal. I don't believe it alone is the solution, but by taking one step at a time we will be able to continue to build upon improvements. No doubt we will never reach a 100-percent efficient method for converting fuels into energy, but methods and techniques which improve this conversion should be encouraged and fully supported where it is apparent a net-positive impact (over the status-quo) on resources, our livelihood, and the environment can be realized.

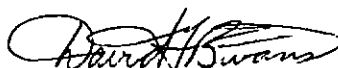
I hope the EPA can support this small step towards improvement. EPA's role in moving the country ahead couldn't come at a better opportunity with the world once again struggling with the implications of turmoil in the Middle East.

September 5, 1990
Administrator Reilly
Environmental Protection Agency

2

Although urgency may advocate approval, it should not be with reckless abandon. The facts of the matter should be thoroughly reviewed. The extensive history of this additive indicates it will be beneficial and should be approved. I encourage you to expedite your review process and issue your decision as soon as possible. Let's move the United States back on track to a more favorable energy supply-demand posture while simultaneously improving our environment.

Sincerely,

A handwritten signature in cursive script, appearing to read "David G. Bivans".

David G. Bivans